

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re: Vitamin Antitrust Litigation

Misc. No. 99-0197 (TFH) (AK)
MDL No. 1285

This document relates to:
ALL ACTIONS

FILED

MAR 21 2002

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

TFH
STIPULATION AND PROPOSED ORDER

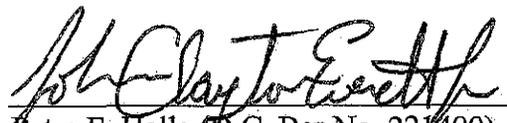
IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the
undersigned:

1. Degussa AG shall have until March 22, 2002 to file and serve its
opposition to Plaintiffs' Motion to Compel Production of Travel and Expense Reports for
Degussa AG Conspirators ("Motion"); and
2. Nothing in this Stipulation shall be deemed to waive any defense of
Degussa AG, including specifically, but without limitation, insufficiency of service of
process and lack of personal jurisdiction.

2814

Dated: March 20, 2002

Respectfully submitted,



Peter E. Halle (D.C. Bar No. 227499)
Thomas J. Lang (D.C. Bar No. 452398)
J. Clayton Everett, Jr. (D.C. Bar No. 469652)
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

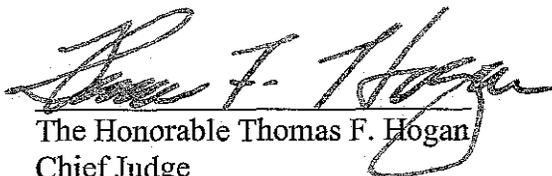
Attorneys for Defendant Degussa AG



Elaine Metlin *JCE with permission*
James R. Martin
Dickstein, Shapiro, Morin & Oshinsky LLP
2101 L Street, NW
Washington, D.C. 20037-1526

On behalf of all plaintiffs for purposes of this
Stipulation

SO ORDERED:



The Honorable Thomas F. Hogan
Chief Judge
United States District Court
for the District of Columbia

Dated: March 21, 2002